

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

JULIEN KING,

Defendant

) Criminal No. 19cr10340
)
) Violation:
)
) Count One: Possession of Ammunition after
) Domestic Violence Conviction
) (18 U.S.C. § 922(g)(9))
)
) Forfeiture Allegation:
) (18 U.S.C. § 924(d); 28 U.S.C. § 2461(c))

INDICTMENT

COUNT ONE

Possession of Ammunition after Domestic Violence Conviction
(18 U.S.C. § 922(g)(9))

The Grand Jury charges:

On or about March 29, 2019, in Framingham, in the District of Massachusetts, the
defendant,

JULIEN KING,

knowing that he was previously convicted in a court of a misdemeanor crime of domestic violence,
to wit: Assault and Battery on a Family or Household Member, in violation of Massachusetts
General Laws Chapter 265 Section 13M, out of Framingham District Court, on or about January
26, 2017, in criminal case number 1649CR003085, did knowingly possess, in and affecting
commerce, ammunition, that is, approximately 44 rounds of assorted .22 caliber ammunition and
one spent .22 caliber cartridge case.

All in violation of Title 18, United States Code, Section 922(g)(9).

FIREARM FORFEITURE ALLEGATION
(18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c))

The Grand Jury further finds:

1. Upon conviction of the offense in violation of Title 18, United States Code, Sections 922(g)(9), set forth in Count one of this Indictment, the defendant,

JULIEN KING,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), any firearm or ammunition involved in or used in any knowing commission of the offense. The property to be forfeited includes, but is not limited, to the following:

- a. Approximately 44 rounds of assorted .22 caliber ammunition and one spent .22 caliber cartridge case; and
- b. J. Stevens Arms Co., Model 53-B, .22 caliber bolt-action rifle containing no serial number.

2. If any of the property described in Paragraph 1, above, as being forfeitable pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), as a result of any act or omission of the defendant --


- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in Paragraph 1 above.

All pursuant to Title 18, United States Code, Section 924, and Title 28, United States Code, Section 2461.

A TRUE BILL


FOREPERSON


SUZANNE SULLIVAN JACOBUS
ASSISTANT UNITED STATES ATTORNEY
DISTRICT OF MASSACHUSETTS

District of Massachusetts: SEPTEMBER 12, 2019
Returned into the District Court by the Grand Jurors and filed.


DEPUTY CLERK

9-12-19

1:07 pm